

Department of Energy

Western Area Power Administration P.O. Box 11606 Salt Lake City, UT 84147-0606

Mr. Robert Johnson
Regional Director
ATTN: BC00-4600
U.S. Bureau of Reclamation
Lower Colorado Region
P.O. Box 61470
Boulder City, NV 89006-1470

Dear Mr. Johnson:

Western Area Power Administration (Western) appreciates the opportunity to comment on the review of the "Criteria for Coordinated Long-Range Operation of the Colorado River Reservoirs" (Operating Criteria) and on the proposal to conduct a public meeting on the review of the Operating Criteria.

Western annually markets and transmits nearly 10,000 megawatts of power from 55 hydropower plants owned and operated by the U.S. Bureau of Reclamation, Army Corps of Engineers and others. Western operates and maintains an extensive, integrated and complex high-voltage power transmission system to deliver power to customers who are the recipients of Federal electrical power generated at Western dams. Western's Colorado River Storage Project Management Center (CRSP MC) markets power from Reclamation power facilities in the upper Colorado River Basin. Its Desert Southwest office markets power from facilities in the lower Colorado River Basin.

Both of the Western offices which are involved in electric power production located in the Colorado River Basin work closely with Reclamation in order to maintain the flow of electric power to meet Federal contractual requirements while recognizing the other purposes for which Colorado River projects were authorized.

Western has been a participant in the development of the Annual Operating Plan (AOP), a process which developed over concerns regarding high flood releases in 1983. While participating in this public process over the years since, Western has voiced opinions and concerns regarding a number of issues related to electric power production. In this process, its opinions have been heard and acted upon. Moreover, Western has learned to appreciate the problems and opinions of others.

Western believes that the productive coordination and information sharing that occurs during the AOP process represents the public input needed for implementation of the Operating Criteria and is sufficiently flexible to adjust to a variety of hydrological circumstances. Therefore, Western supports the continuation of this process and sees no compelling reason for modification of the Operating Criteria at this time.

Sincerely.

S. Clayton Palmer

Manager, Environmental and Resource Planning